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November 26, 2024

VIA ECF

Hon. Lewis J. Liman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007

Re: Leave to File Plaintiff's Partial Motion for Reconsideration Under Seal in *Adstra, LLC v. Kinesso, LLC and Acxiom, LLC*, Civil Action No. 24-cv-02639 (LJL)

Dear Judge Liman,

We are counsel to Adstra, LLC ("Adstra" or "Plaintiff") in the above-captioned matter. On behalf of Adstra, we respectfully seek leave to file under seal unredacted versions of the Memorandum of Law filed in support of Plaintiff's Partial Motion for Reconsideration, and certain exhibits attached to the Declaration of Anne Burton-Walsh, all of which are being filed today in redacted form or with a placeholder pursuant to Your Honor's Rule 2(H) and Attachment A of Your Honor's Individual Practices, and Local Rule 6.1.

Although Plaintiff is not of the view that the redacted material constitutes confidential information of a sensitive or proprietary nature such that it would harm Defendants Acxiom, LLC and/or Kinesso, LLC ("Acxiom" or "Kinesso") if disclosed, because Defendants have marked each of the above-referenced documents or information as confidential, we are required to file these materials under seal.

As such, Adstra, LLC respectfully requests that the Court grant it leave to file the aforementioned papers under seal. Thank you for your time and attention to this matter.

Sincerely,

/s/ Anne Burton Walsh
Anne Burton-Walsh